

Exhibit E
(Dkt. No. 42-5)
REDACTED

1 FEDERAL TRADE COMMISSION

2

3 In the Matter of:)

4 TWITTER, INC.,) Matter No.

5 a corporation.) C-1316

6 -----)

7

8 Friday, December 2, 2022

9

10 Via Zoom

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13 The above-entitled matter came on for
14 investigational hearing, pursuant to notice, at
15 12:30 p.m., Eastern Standard Time.

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25 Reported by: Sally Jo Quade, RPR

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1 APPEARANCES:

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1 agreement at Twitter will prevent you from providing
2 complete and accurate answers to my questions today?

3 A. No. My recollection is that the agreement is
4 quite clear that, you know, you have to comply with
5 legal requirements, so such as a deposition. So I don't
6 believe that there would be anything that would prevent
7 me.

8 Q. And you are here today pursuant to a Rule 45
9 subpoena, correct?

10 A. Which is sitting next to me on my table.

11 Q. Yes. Okay. Are you currently under the
12 influence of any medications that would affect your
13 ability to participate in today's deposition?

14 A. No, I am not.

15 Q. Is there any reason you would not be able to
16 testify accurately and truthfully today?

17 A. No.

18 Q. When did you start working at Twitter?

19 A. I'm going to get the date wrong, but it was the
20 start of January 2016.

21 Q. And when you joined, what was your job position
22 there?

23 A. I was hired to lead all non-U.S. litigation and
24 regulatory matters for the company.

25 Q. Do you remember what your job title was when you

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1 first joined?

2 A. I was just a -- so the company was much, much
3 smaller, so it was just international litigation and
4 regulatory counsel, but the titles and things changed in
5 time as the company got larger and the team got larger.

6 Q. And at some point did you change job positions?

7 A. I did.

8 Q. Do you remember roughly when?

9 A. It was the start of 2018, January or February of
10 2018. Again, I can't remember exact date.

11 Q. Sure. And how did your job position change
12 around that time?

13 A. Around that time, I was -- basically I was the
14 successful candidate to become Twitter's first data
15 protection officer, and so I became the data protection
16 officer and was charged with sort of starting that team.

17 Q. What does it mean to be a data protection officer
18 for Twitter or what did it mean to be a data protection
19 officer for Twitter?

20 A. I mean, you know, obviously it sort of changes
21 over time as the company changes and scales, but in its
22 simplest format, what the company was seeking to achieve
23 was to comply with the requirements of GDPR, which were
24 coming up to go into effect in May of 2018, and one of
25 those requirements was to have a data protection officer

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1 that could meet the requirements of the GDPR, and so at
2 its simplest, it was a data protection officer who would
3 discharge the obligations under GDPR.

4 Q. And the GDPR are EU regulations, correct?

5 A. Correct. Yes. Yes.

6 Q. Did you also have an additional title -- let me
7 ask you this, when you were -- when you first became the
8 first data protection officer for Twitter around early
9 2018, did you also have additional titles in connection
10 with other roles that you had at the company?

11 A. I didn't have additional titles. I mean, there
12 are internal titles that relate to job levels on
13 ladders, if that's what you mean. And I actually don't
14 remember what I was at that point in time. I think it
15 could have been associate legal director, maybe, but I
16 have to check. But again, those are more a correlation
17 of seniority as opposed to anything else.

18 Q. So when you became data protection officer in
19 early 2018, were you still in the legal department at
20 Twitter?

21 A. I was. I was in the legal department.

22 Q. And at some point did your job position at
23 Twitter change?

24 A. I don't know that I would view it as ever
25 changing. It sort of -- the role and the obligations

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1 that I discharged from sort of spring of 2018 to the --
2 to when I left were effectively the same. They just
3 changed in the sense that the company's needs shifted
4 and moved somewhat, but like my core obligations, which
5 were I think summarized best as when I testified not too
6 long after I became the data protection officer in 2018,
7 I testified at the Senate and sort of the statement that
8 we gave publicly was that my responsibility and my
9 team's responsibilities were to ensure Twitter's
10 compliance with global privacy and data protection
11 requirements. You know, GDPR or otherwise. And so that
12 never really changed, if that makes sense, it was just
13 discharging that suite of responsibilities.

14 Q. I understand. So if I had looked at your
15 LinkedIn profile, for example, and it looked like at one
16 point it said you were associate legal director and then
17 at some point, say in February of 2019, it said legal
18 director and associate general counsel. Is that simply
19 a reflection of your rising seniority levels and not
20 necessarily a change in the substance of what you were
21 doing?

22 A. Yeah, apologies for speaking over you, and
23 apologies to the court reporter, too.

24 Yes, in short answer, those titles relate to an
25 internal job ladder which then relates to compensation,

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1 candidly. So, you know, is there value in titles, sure,
2 the reality, I think, and in-house practice is it's
3 the -- it's part of your compensation.

4 Q. Now, at some point, Mr. Kieran, you became the
5 chief privacy officer. Is that correct?

6 A. That's correct.

7 Q. And when did that happen?

8 A. Oh, August of -- and I will get the year wrong
9 because of Covid, I'm going to say it was 2020, but I
10 could be wrong. I think it was August 2020.

11 Q. So around August of 2020, thereabouts, you took
12 on the title of chief privacy officer?

13 A. Correct.

14 Q. Did that come with any change in the -- your job
15 duties and responsibilities?

16 A. No.

17 Q. Why did the title -- if you can say, why the
18 title change?

19 MR. KOFFMANN: Could I interpose here just to
20 caution the witness that, you know, as we discussed,
21 communications in your role as a lawyer, communications
22 with company management, company employees, may be
23 privileged, and so I just caution you, as well as your
24 impressions about the answer to this question, your
25 impressions as a lawyer. So I just caution the witness

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1 to -- if he can answer it without going into those
2 communications or those impressions, that's fine, but to
3 the extent that the answer does require disclosing
4 those, I would instruct him not to answer.

5 THE WITNESS: Got it. And, Dan, help me to get
6 it, I'm trying to keep to the right line of this, so I'm
7 not sure how best to proceed, if this requires an
8 offline conversation, but to me this is about career
9 development stuff, not lawyer stuff.

10 MR. KOFFMANN: I understand.

11 THE WITNESS: So, but if you all want to chat
12 about it before I talk to Ms. Kim, I'm happy to do that.
13 That's not my goal at all.

14 BY MS. KIM:

15 Q. Well, let me ask it this way: Mr. Kieran, when
16 you took on the chief privacy officer title in or about
17 August of 2020, did you continue to serve as the data
18 protection officer for GDPR purposes?

19 A. I did. Perhaps maybe the best answer I can give
20 here without going into the detail of it is at the end
21 of the day there was a public connotation with a CPO
22 title in the United States versus a DPO title, and this
23 is an industry tension, right, whether they mean the
24 same thing or don't mean the same thing. And so for my
25 career, it was important to me that I got to that title.

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1 So this has nothing to do with like a legal change or a
2 thing, it was for my career development. The role did
3 not change in terms of what I did and how I had to
4 discharge it.

5 I hope that's okay, Dan.

6 MR. KOFFMANN: Yep, no objection.

7 BY MS. KIM:

8 Q. So starting, let's say, in January of 2020, to
9 whom were you reporting?

10 A. January of 2020. January of 2020. So the reason
11 I'm hesitating is at that time -- I can't remember when
12 there was a change made, but there was a gentleman who
13 had been hired who did not work out, his name was Todd
14 Cohen, and he left the company some time around that
15 period, but I had been reporting to Todd, who reported
16 to Sean Edgett, the general counsel. After Todd left, I
17 reported to a person called Stephanie King, and so just
18 the dates elude me, so I'm not sure when that change
19 was, if that makes sense.

20 Q. Understood. But it sounds like, in any event, in
21 terms of the reporting relationships, there would be
22 someone between you and Sean Edgett, the general
23 counsel?

24 A. So that changed over the years. So there was a
25 period further back in time where I reported directly to

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1 because I'm remembering sequencing. So it was five, it
2 wasn't three. And then voluntary resignations at that
3 time, while I was there, no.

4 Q. Did you hear of any additional resignations that
5 happened on the privacy and data protection team after
6 you left the company?

7 A. So I don't know whether I would call them
8 resignations. I just want to make sure that the
9 nomenclature is correct. What I mean is simply that
10 obviously Mr. Musk provided an opportunity to opt in or
11 opt out, as it were, and stay with the company or leave.
12 A number of folks on my team opted to leave -- a lot of
13 the folks on my old team opted to leave.

14 Q. About how many, if you know?

15 A. About 50 percent.

16 Q. Was that like 15, 16 people?

17 A. Yeah, 15, 16 people.

18 Q. And your understanding was that was in response
19 to Mr. Musk's instruction about having to -- I forget
20 the exact wording you used, up their game?

21 A. I don't know the exact wording. I obviously
22 wasn't there and, you know, I know what was reported in
23 the media in terms of what was reported, but all I can
24 speak to is simply the folks on my team who stayed in
25 touch who I know opted to not remain at Twitter.

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1 A. The information security team.

2 Q. And then at some point did Dr. Kissner formally
3 become the new CISO?

4 A. Yes. The date of that is going to escape me, but
5 it was some time in the spring. I can't remember when
6 we finalized it.

7 Q. I think you mentioned that there were -- when I
8 asked -- this all came up in response to my question I
9 asked about whether there were other teams or
10 departments that you indirectly oversaw or helped manage
11 and you were talking about the info sec team or
12 organization, and it sounds like it's in connection with
13 the various transitions in leadership in that
14 organization. Is that accurate?

15 A. Yes, with an addition. It wasn't just during the
16 transitions, whenever you have leaders who are there for
17 a short period of times, and I don't think this is
18 unique to the information security team, there will tend
19 to be individuals who have long-tailed historical
20 knowledge about how the organization operates and how
21 things need to be done and support those new individuals
22 when they're in their roles.

23 And so I served in that capacity for every one of
24 the people, because I was effectively the longest
25 standing person with seniority who had knowledge of, you

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1 know, how you do things, what you do, when you do them,
2 et cetera.

3 Q. Was there someone -- if you had to identify
4 someone who would have the next most senior
5 long-standing knowledge that you have that would be
6 relevant to the info sec team, who would that be?

7 A. So it would have been Joseph Camilleri until he
8 left to go to Stripe. Then beyond that, it's going to
9 be folks who have knowledge of pieces, but not the
10 overall, and that's I think the difference, right? So,
11 for example, Seth Wilson would have a lot of knowledge
12 about a portion of the information security program and
13 what it does. Andy Saylor, a portion of the program and
14 what it does. But the overarching, like all the things,
15 there was -- today there is nobody left and there -- you
16 know, even during the last year, there was nobody other
17 than myself who had that knowledge.

18 Q. I understand Seth led or leads the DART,
19 detection and response team.

20 A. That's what it was called. I don't know what
21 it's called today, but that is what it was called.

22 Q. Is it your understanding that he is no longer at
23 Twitter?

24 A. No, it's my understanding that he is there
25 through the end of the year.

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1 variety of other players around the company in different
2 teams who also have roles that support that program.

3 Q. Does the program have a name? Did the program
4 have a name?

5 A. Privacy and data protection program.

6 Q. And what other teams besides your former privacy
7 and data protection team supported the privacy and data
8 protection program?

9 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 [REDACTED]

██████████

████████████████████

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1 [REDACTED]
[REDACTED]

3 Q. Without disclosing privileged information, what
4 can you tell me about the impact of the staff
5 terminations on the various teams that supported
6 Twitter's privacy and data protection program?

7 MR. KOFFMANN: Yeah, if I can just --

8 MS. KIM: Just numbers or percentage, roughly.

9 MR. KOFFMANN: Thank you for that clarification.

10 THE WITNESS: So roughly percentage of people
11 impacted on those various teams, yeah, that's going to
12 be a little bit hard. I think it's easier for some
13 things. So, for example, the internal audit team,
14 because we were no longer going to be a publicly traded
15 company, internal audit is typically a function for a
16 publicly traded company. So much of internal audit was
17 reduced; however, the pieces needed that support a PDP
18 program were retained and they were actually moved into
19 my team before I had left. So that's an example.

20 On the security, the information security team,
21 so I am reluctant to use percentages or hard numbers
22 here because, candidly, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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1 feasible for a very small number of controls for them to
2 be owned by sort of an amorphous organization, because
3 some of the ISO controls are so generalized that it is
4 less specific to have an owner, but as a general
5 proposition, you should have an owner for each control.

6 Q. And is that owner for those controls, are they
7 the person responsible for making sure the control is
8 operating as it should be?

9 A. Yes. So there's -- there is a -- there's
10 documentation from ISO and other organizations -- other
11 standard-setting organizations that talk about what a
12 control owner should do, not do, be, not be. And so as
13 a general proposition, within that sort of generalized
14 guidance from ISO or BSI would be what is expected of a
15 control owner, you know, implementation, documentation,
16 ownership measurement, et cetera.

17 Q. Did you have a sense of whether the staff
18 reductions at Twitter following Mr. Musk's acquisition
19 affected the headcount of control owners for controls
20 that rolled up into the privacy and data protection
21 program?

22 A. So there was an impact on control ownership as a
23 result of the reductions in force.

24 Q. Without giving a legal opinion, is there anything
25 you can tell me factually about what that impact was?

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1 For example, numbers of former control owners who are no
2 longer at the company.

3 A. I couldn't give you that, because I don't
4 actually know what that correlated to. The number that
5 I would have would be [REDACTED]
[REDACTED]
[REDACTED]

8 Q. Before you reached your decision to resign from
9 Twitter, had you discussed your decision with anyone
10 else from the company before you made it final?

11 A. As I mentioned earlier, I had, yes.

12 Q. Can you identify who at the company you had
13 discussed your decision with before you made it final,
14 without disclosing privileged information?

15 A. Identifying just people.

16 Q. Yes.

17 A. So I had discussed it with Lea Kissner, with
18 Marianne Fogarty, and you're only interested in people
19 at the company, correct?

20 Q. If there's anyone who used to work for Twitter
21 that you also discussed it with, I would also want to
22 know that, but at this point, your wife and your
23 friends, you don't have to tell me that.

24 A. Yeah, understood. So Lea Kissner, Marianne
25 Fogarty, Seth Wilson, Andy Saylor, Kathleen Pacini,

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1 Kevin Cope. Julianna Hayes. I think that was it.

2 Q. Are those all -- were those individuals all
3 current employees at Twitter at the time you had those
4 discussions?

5 A. At the time I had the discussions with them they
6 were, yes.

7 Q. Is there anything you can tell me about the
8 nature of your discussions with those individuals
9 without disclosing privileged information?

10 A. I don't believe so.

11 Q. I'm sorry, you said no?

12 A. I don't believe so.

13 Q. As I understand it, you, Dr. Kissner and
14 Ms. Fogarty all resigned around the same time. Is that
15 accurate?

16 A. Within 24 hours.

17 Q. And at the time, Dr. Kissner was Twitter's chief
18 information security officer?

19 A. Correct.

20 Q. And Ms. Fogarty was the company's chief
21 compliance officer?

22 A. Correct.

23 Q. Had you planned to resign together or around the
24 same time?

25 A. No, insofar -- to clarify just the question, like

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1 we're all going to resign at 12:00 p.m., no, that is not
2 a thing that was discussed. Were there discussions
3 related -- were there discussions about we were
4 resigning now-ish, meaning, you know, in short order,
5 yes.

6 Q. Is there anything more you can tell me, without
7 disclosing privileged information, about why the three
8 of you chose to resign around the same time?

9 A. No. I don't believe so. I think the only
10 additional thing would be just for the avoidance of
11 doubt in terms of when I asked earlier were you
12 interested in people that worked at Twitter or not, what
13 I was actually referring to was the names of lawyers
14 that I had spoken to outside of the company, and so I
15 had conversations with lawyers, you know, outside of the
16 company.

17 Q. Okay. And I don't want to get into that, but
18 just in terms of it seems that you, Dr. Kissner and
19 Ms. Fogarty, the news of your resignations all seemed to
20 come out at the same time as if all three of you
21 resigned -- chose to resign together. I'm trying to
22 understand if you would agree that the three of you had
23 an understanding that you were going to resign around
24 the same time.

25 A. As I mentioned earlier, a generalized yes, but to

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1 be clear, it wasn't something in unison at some specific
2 point in time, right?

3 Q. Is there anything you can tell me that's not
4 privileged about why the three of you chose to resign
5 around the same time?

6 A. No, the only thing I can share, again, is that I
7 had conversations with, you know, counsel, and that was
8 it.

9 Q. Are you able -- I mean, it wasn't just a
10 coincidence that the three of you resigned at the same
11 time. Is that correct?

12 A. I can't speak for them, but I think the -- at the
13 culmination of conversations that we had had as a group
14 led to our decisions to depart independently.

15 Q. I apologize if I've already asked this, but is
16 there anything more that you can say -- that's not
17 privileged -- that you can say about the discussions the
18 three of you had as a group before your resignations?

19 A. No. I mean, I'm probably stating the obvious,
20 but I think, you know, we were all members of the data
21 governance committee at Twitter, and so, you know, our
22 conversations would have been as it relates to our
23 obligations under the data governance committee.

24 Q. Is there anything you can say that's not
25 privileged about whether -- strike that.

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1 Time.)

2 BY MS. KIM:

3 Q. I have marked a document as Exhibit 2, it's a
4 blog post from the Twitter blog entitled "Our continued
5 work to protect your privacy and security," it appears
6 to be dated Wednesday, November 10th, 2021. Do you see
7 that, Mr. Kieran?

8 A. As if by chance, yes.

9 Q. And it appears to be offered by you and Rinki
10 Sethi. Is that true?

11 A. Yes.

12 Q. And this is a blog post that's available to the
13 general public. Is that your recollection?

14 A. Correct.

15 Q. Who wrote this blog post?

16 A. So the comms team helped, but the draft was
17 written by me and edited by the comms team and then I
18 reviewed it and approved it and then Rinki reviewed it
19 and approved it.

20 Q. So this is the governance committee that you were
21 referring to earlier before we went on break?

22 A. Yes, there were other things in the post, but
23 yes, the governance committee is part of what's in this
24 post.

25 Q. So I think you may have started to answer this as

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1 part of your explanation earlier, but I'm looking at the
2 blog post, second paragraph, starting around the middle
3 of that second paragraph, it says, "The post says that
4 the Data Governance Committee (DGC) will ensure we are
5 making consistent and balanced decisions around how we
6 use and protect your data."

7 Now, can you explain how the data governance
8 committee accomplished that objective?

9 A. So the goal of the committee was obviously to be
10 an approver, a decision-maker with respect to, again, as
11 I said earlier, collection, use, maintenance, access,
12 sharing of data that Twitter had obtained or collected,
13 and so there's a couple of different ways in which the
14 committee would discharge that obligation. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 Q. So this paragraph goes on to say that "the
25 committee will oversee all decisions to collect,

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1 Beykpour already left the company?

2 A. So Bruce Falck and Kayvon Beykpour left the
3 company in spring of 2022, and so they were replaced on
4 the committee with two other individuals, and those two
5 individuals were Nick Caldwell and Jay Sullivan.

6 Q. Was Nick head of revenue or head of consumer
7 product?

8 A. So when Kayvon left, Jay Sullivan assumed his
9 role as head of consumer product. When Bruce left,
10 there was no one to assume his role immediately, so Jay
11 actually was running that in the interim all the way up
12 until, you know, Elon's takeover, or transition.

13 So to deal with that complexity, we had Nick
14 Caldwell take an interim role on the data governance
15 committee, because Nick was head of platform
16 engineering, so he was not head of revenue product or
17 consumer product, which were the two stated roles. So
18 in the interim, we had Jay serve -- Jay and Nick serve
19 on the committee, with the full intention that when
20 Bruce Falck's backfill was hired, Nick would leave the
21 committee and Bruce's backfill would take the position.

22 Q. At the time Maryanne Fogarty left or resigned on
23 November 9th, was Nick Caldwell still serving on the
24 data governance committee?

25 A. No. So I won't get the dates quite right here,

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1 but Nick and Jay they vacated their roles somewhere in
2 or around the time of Elon -- Mr. Musk's takeover. So
3 the 27th -- between the 27th and the 1st, and I wouldn't
4 know the exact dates.

5 Q. When you say they vacated their roles, did they
6 leave their jobs at the company or simply step down from
7 the data governance committee?

8 A. Yeah, so resignations were tendered -- excuse me,
9 resignations were tendered from their roles at the
10 company, but it was sort of -- it is -- I am not able to
11 opine on whether they were fired or whether they
12 resigned. Yeah.

13 Q. But that happened it sounds like not long before
14 you left, so Nick Caldwell and Jay Sullivan, who had
15 been potentially filling -- well, Jay Sullivan was the
16 new head of consumer product, Nick Caldwell was filling
17 in for what would have been the head of revenue on those
18 two slots in the data governance committee, and they
19 both left the company at some point shortly after Elon
20 Musk took over?

21 A. Correct. And at that point, we still had three
22 people, which because of the rules of the committee,
23 needing three for a decision, we could still operate.
24 Hence why I said all the way up until Maryanne Fogarty
25 departed on the 9th, the committee technically could

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1 BY MS. KIM:

2 Q. I'm going to mark the next exhibit. Exhibit 3 is
3 a blog post it appears by you dated May 25th, 2022
4 that's titled, "FTC settlement: Our commitment to
5 protecting your privacy and security." Do you see it?

6 A. I do see it.

7 Q. And is that a blog post that you wrote,
8 Mr. Kieran?

9 A. In similar vein to the others, though, it is
10 written in consultation, obviously, with our comms, with
11 what was our comms team, but yes.

12 Q. So was it written as -- did you help compose it
13 as a representative of Twitter rather than in your
14 personal capacity?

15 A. I'm not sure I follow.

16 Q. Was it your understanding that in helping to
17 draft the language of this blog post that this -- you
18 were doing so as a representative of Twitter rather than
19 just you being here and posting as an individual?

20 A. No, this is for the company. Yeah.

21 Q. Were these statements in the blog post at Exhibit
22 3 truthful at the time you wrote them?

23 A. Yes.

24 Q. At the beginning of the second paragraph, you
25 wrote, "Keeping data secure and respecting privacy is

Kieran

Twitter, Inc.

12/2/2022

1

[REDACTED]

[REDACTED] was that workstream completed at the
21 time you left?

22 A. Yes. That had been completed in or around June,
23 when we -- when this blog post was done.

24 Q. I'm not asking for privileged information here,
25 but as of October 26th, the day before Mr. Musk came in,

Kieran

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12/2/2022

1 who was responsible for making sure that the company
2 complied with the FTC order?

3 A. So the individuals designated for the various
4 responsibilities were Dr. Kissner for the security
5 program, myself for the privacy program, and then
6 obviously we had the data governance committee, which I
7 have already explained, so for that portion of it. And
8 then while we had not reached that milestone, the -- at
9 the first annual sort of certification date, the plan
10 was that each member of the C-suite would certify
11 individually for their organization to ensure that we
12 aligned incentives with resources for complying with the
13 program requirements.

14 Q. Who at Twitter -- and I apologize if you feel
15 you've already answered this in your explanations
16 previously, but who at Twitter was responsible for
17 developing the company's privacy and data protection
18 program?

19 A. That would be me.

20 Q. And did you share these responsibilities with
21 anybody else?

22 A. For developing the program, no. I mean, I sought
23 feedback and input from a variety of stakeholders, but
24 the responsibility to develop it and implement it was
25 me.

Kieran

Twitter, Inc.

12/2/2022

1 "QUESTION: Without disclosing privileged
2 information, what can you tell me about your involvement
3 with the development of this new version of Twitter
4 Blue?"

5 THE WITNESS: So I was involved in that I ensured
6 that the security and privacy reviews were appropriately
7 conducted.

8 BY MS. KIM:

9 Q. And were those security and privacy reviews
10 appropriately conducted on the new version of Twitter
11 Blue before it launched in early November?

12 A. The version that launched on November 9th, yes.

13 Q. Did the new version of Twitter Blue that launched
14 in early November undergo any aspect of the company's
15 software development lifecycle?

16 A. So the -- to ensure the speed that the product
17 and engineering team was trying to work at and to ensure
18 that we did the security and privacy reviews, we ensured
19 that there was a different measures in place to ensure
20 that we conducted those reviews; however, it was not in
21 accordance with the SDLC as we had it before that date.

22 Q. In what way was it not in accord with the SDLC as
23 it existed at that date?

24 A. I think now we're getting into privileged areas
25 that I probably can't answer.

Kieran

Twitter, Inc.

12/2/2022

1 DISTRICT OF COLUMBIA, to wit:

2

3 I, Sally Jo Quade, RPR, the officer before whom
4 the foregoing deposition was taken, do hereby certify
5 that the within-named witness personally appeared before
6 me at the time and place herein set out, and after
7 having been duly sworn by me, according to law, was
8 examined by counsel.

9 I further certify that the examination was
10 recorded stenographically by me and this transcript is a
11 true record of the proceedings.

12 I further certify that I am not of counsel to any
13 of the parties, nor an employee of counsel, nor related
14 to any of the parties, nor in any way interested in the
15 outcome of this action.

16

17 As witness my hand and notarial seal this 5th day
18 of December, 2022.

19

20

21

22

A handwritten signature in cursive script, reading "Sally Jo Quade", is written over a horizontal line.

Sally Jo Quade, RPR
Notary Public

23

24

25 MY COMMISSION EXPIRES:

26

7/14/2023

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